

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICOUNITED STATES OF AMERICA,
Plaintiff,

v.

1. RAUL RIVERA-PEREZ, a.k.a.
"Toño", a.k.a. "Macho";
2. MILTON A. NELSON, a.k.a.
"Gallego";
3. LUIS CARIBE-GARCIA, a.k.a
"Papo", a.k.a. "Caribe";
4. VICTOR MANUEL VALLE-
LASALLE, a.k.a. "Manolo";
5. LUIS DIAZ, a.k.a.
"Luisín", a.k.a. "Sobrino";
6. EDWIN MARRERO-RIVERA,
a.k.a. "Canito", a.k.a.
"Cano", a.k.a. "Canito
Chequero"
7. ANGEL CHEVERE-GONZALEZ,
a.k.a. "Junior", a.k.a.
"Junito", a.k.a. "Chévere";
8. MIGUEL A. RODRIGUEZ-
RIVERA, a.k.a. "Tan";
9. LUIS TORRES OROZCO,
a.k.a. "Charlie", a.k.a.
"Ricardo González";
10. EDUARDO ARROYO-MALDONADO,
a.k.a. "Pedro", a.k.a.
"Guacamayo";
11. LUIS ROMERO-LOPEZ,
a.k.a. "Nando";
12. JULIO ORTIZ-GUEVARA;
13. CARLOS BONET-GONZALEZ,
a.k.a. "Charlie", a.k.a.
"Charlie Brown";

Defendant.

SUPERSEDING INDICTMENT

CRIMINAL NO. 97-245(PG)

Violations:

Title 21, U.S.C., §846
Title 21, U.S.C.,
§841(a)(1)

ONE COUNT

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THE GRAND JURY CHARGES:

COUNT ONE

Beginning on a date unknown, but no later than in or about April 1997, and ending on a date unknown, but no earlier than in or about the date of the return of this Indictment, in *Carolina*, *Puerto Rico*

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Cataño, Isabela, and the San Juan Metropolitan Area for the District of Puerto Rico, and in New York City, Colombia, South América, the High seas and elsewhere, and within the jurisdiction of this Court, the defendant herein, and others to the Grand Jury known and unknown, including, but not limited to,

1. RAUL RIVERA-PEREZ,
a.k.a. "Toño", a.k.a. "Macho";
2. MILTON A. NELSON,
a.k.a. "Gallego";
3. LUIS CARIBE-GARCIA,
a.k.a "Papo", a.k.a. "Caribe";
4. VICTOR MANUEL VALLE-LASALLE,
a.k.a. "Manolo";
5. LUIS DIAZ,
a.k.a. "Luisin", a.k.a. "Sobrino";
6. EDWIN MARRERO-RIVERA,
a.k.a. "Canito", a.k.a. "Cano", a.k.a. "Canito Chequero"
7. ANGEL CHEVERE-GONZALEZ,
a.k.a. "Junior", a.k.a. "Junito", a.k.a. "Chévere";
8. MIGUEL A. RODRIGUEZ-RIVERA,
a.k.a. "Tan";
9. LUIS TORRES OROZCO,
a.k.a. "Charlie", a.k.a. "Ricardo González";
10. EDUARDO ARROYO-MALDONADO,
a.k.a. "Pedro", a.k.a. "Guacamayo";
11. LUIS ROMERO-LOPEZ,
a.k.a. "Nando";
12. JULIO ORTIZ-GUEVARA;
13. CARLOS BONET-GONZALEZ,
a.k.a. "Charlie", a.k.a. "Charlie Brown";

did unlawfully, knowingly, willfully, and intentionally combine, conspire, confederate, and agree together with divers other persons to the Grand Jury known and unknown, to posses with intent to distribute amounts of cocaine, a Schedule II narcotic drug controlled substance, which amounts of cocaine exceeded One Thousand (1,000) kilograms; heroin, a Schedule I, Narcotic Drug

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Controlled Substance, which amounts of heroin exceeded Five (5) Kilograms; and marijuana, a Schedule I controlled substance, which amounts exceeded Five Thousand (5,000) pounds of marijuana, that is, conspiracy to violate Title 21, United States Code, Section 841(a)(1). All in violation of Title 21, United States Code, Section 846.

OBJECTS OF THE CONSPIRACY

The objects of said conspiracy were, among others:

1. To import large amounts of controlled substances into the District of Puerto Rico for further distribution in Puerto Rico and for transhipment into the continental United States.
2. To recruit and maintain a group of individuals with special skills and equipment to facilitate the importation and distribution of narcotics in the United States.
3. To avoid detection by governmental authorities of the organization's activities by using nicknames, placing properties under third parties, purchasing special vehicles, vessels and equipment.

OVERT ACTS

In furtherance of the conspiracy, the co-conspirators committed, amongst others, the following overt acts:

1. In or about April 1997, a Colombian source of narcotics discussed with a person known to this Grand Jury the future importation of loads of cocaine into Puerto Rico and their transhipments to the continental United States.

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2. In or about April 1997, a Colombian source of narcotics made arrangements for a meeting in Puerto Rico between **RAUL RIVERA-PÉREZ**, (also known as ("a.k.a.") "Macho", a.k.a. "Toño"), and a person known to the Grand Jury.

3. On or about April 25, 1997, in San Juan and Carolina, Puerto Rico, **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho"), **EDUARDO ARROYO MALDONADO** (a.k.a. "Pedro", a.k.a. "Guacamayo"), and a person known to the Grand Jury met to discuss the importation of large amounts of cocaine from Colombia, South América, into Puerto Rico, and its subsequent distribution in Puerto Rico and the continental United States.

4. On or about April 27, 1997, **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho"), **EDUARDO ARROYO-MALDONADO**, (a.k.a. "Pedro", a.k.a. "Guacamayo") and one person known to the Grand Jury traveled to Isabela, Puerto Rico, and met with one person unknown to the Grand Jury to inspect a proposed off loading site for a shipment of cocaine.

5. During the late part of April 1997 and during May 1997, **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho") purchased communication and vessel equipment to be used during the importation of narcotics into Puerto Rico.

6. On or about May 3, 1997, **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho") arranged for a meeting between **EDUARDO ARROYO MALDONADO** (a.k.a. "Pedro", a.k.a. "Guacamayo") and two persons known to the Grand Jury at the Travel Lodge Hotel in Isla Verde,

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Carolina, Puerto Rico to discuss sea routes to be used in the importation of narcotics into Puerto Rico.

7. On or about May 3, 1997, EDUARDO ARROYO-MALDONADO (a.k.a. "Pedro", a.k.a. "Guacamayo"), representing RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), and two other persons known to the Grand Jury met to discuss the importation of approximately One Thousand Two Hundred (1,200) kilograms of cocaine into Isabela, Puerto Rico, and the further transportation of this cocaine into Puerto Rico through the use of RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho")' trucks.

8. On or about May 5, 1997, at the parking lot of Plaza Las Américas, in San Juan, Puerto Rico, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho") and a person known to the Grand Jury delivered a two meter radio to a person known to the Grand Jury to be used in the importation of a load of narcotics into Puerto Rico.

9. In June 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), VICTOR MANUEL VALLE-LASALLE, a.k.a. "Manolo", and a person known to the Grand Jury traveled to Guánica, Puerto Rico, to inspect a vessel, and off loading sites to smuggle narcotic shipments to Puerto Rico.

10. In or about June 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho") instructed LUIS DÍAZ (a.k.a. "Luisín", a.k.a. "Sobrino") to travel to Colombia, South América to make arrangements for the importation of a load of cocaine to be transported in a cargo vessel to Puerto Rico.

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11. During June and July 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), MILTON NELSON (a.k.a. "Gallego"), and others known and unknown to the Grand Jury made efforts to obtain the release of LUIS DÍAZ (a.k.a. "Luisín", a.k.a. "Sobrino"), who had been kidnaped in Colombia by narcotics suppliers.

12. During July 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), MILTON NELSON (a.k.a. "Gallego") and others known and unknown to the Grand Jury started to make arrangements for the importation of approximately Ten Thousand (10,000) pounds of marihuana from Colombia, South América through St. Maarten, Netherlands Antilles, to Puerto Rico.

13. On or about July 15, 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), LUIS TORRES OROZCO (a.k.a. "Charlie"; a.k.a. "Ricardo González") and ANGEL CHÉVERE-GONZÁLEZ (a.k.a. "Junior"; a.k.a. "Junito"; a.k.a. "Chévere") discussed the pick-up of Two Hundred Fifty (250) kilograms of cocaine.

14. On or about July 16, 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), and LUIS TORRES OROZCO (a.k.a. "Charlie"; a.k.a. "Ricardo González") received a shipment of Two Hundred Fifty (250) kilograms of cocaine for distribution in Puerto Rico and the continental United States.

15. At different times of this conspiracy, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho") and LUIS CARIBE-GARCÍA (a.k.a. "Papo", a.k.a. "Caribe") discussed the importation and transportation

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of narcotics from Colombia, South America to Puerto Rico and the continental United States.

16. During different times of this conspiracy, **LUIS CARIBE-GARCÍA**, (a.k.a. "Papo", a.k.a. "Caribe") distributed cocaine for **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho").

17. After July 16, 1997 and through August 1997, **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho"), **LUIS TORRES OROZCO**, (a.k.a. "Charlie, a.k.a. "Ricardo González) and others known and unknown to the Grand Jury distributed the Two Hundred Fifty (250) kilograms of cocaine referred to in paragraph number 13.

18. During different times in this conspiracy, **MIGUEL A. RODRIGUEZ-RIVERA** (a.k.a. "Tan") traveled to New York to deliver kilograms of cocaine and pick-up money proceeds of the narcotics distribution for their delivery to **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho") in Puerto Rico.

19. During different times of this conspiracy, **EDWIN MARRERO-RIVERA** (a.k.a. "Canito", a.k.a. "Cano", a.k.a. "Canito Chequero"), and **ANGEL CHÉVERE-GONZÁLEZ**, (a.k.a. "Junior", a.k.a. "Junito", a.k.a. "Chévere") distributed narcotics for **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho").

20. During different times of this conspiracy, **EDWIN MARRERO-RIVERA** (a.k.a. "Canito", a.k.a. "Cano", a.k.a. "Canito Chequero") would pick-up cash proceeds from the distribution of narcotics and deliver them to **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho")

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or to other persons as directed by RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho").

21. On or about July 20, 1997, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho") and EDWIN MARRERO-RIVERA (a.k.a. "Canito", a.k.a. "Cano", a.k.a. "Canito Chequero") discussed the pickup and distribution of narcotics.

22. On August 16, 1998, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), LUIS CARIBE-GARCÍA, (a.k.a. "Papo", a.k.a. "Caribe"), and an individual known to the Grand Jury discussed the importation of approximately One Thousand One Hundred (1,100) kilograms of cocaine from Colombia, South América to Puerto Rico.

23. On or about October 30, 1997, in Humacao, Puerto Rico, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), LUIS CARIBE-GARCÍA, (a.k.a. "Papo", a.k.a. "Caribe"), CARLOS BONET-GONZALEZ, (a.k.a. "Charlie", a.k.a. "Charlie Brown"), LUIS ROMERO-LOPEZ, (a.k.a. "Nando"), and an individual known to the Grand Jury met to discuss the pick-up and smuggling of narcotics into Puerto Rico.

24. On or about October 30, 1997, begining in Humacao, Puerto Rico, RAUL RIVERA-PEREZ, (a.k.a. "Toño", a.k.a. "Macho"), CARLOS BONET-GONZALEZ, (a.k.a. "Charlie", a.k.a. "Charlie Brown"), LUIS ROMERO-LOPEZ, (a.k.a. "Nando"), and an individual known to the Grand Jury traveled from Humacao, Puerto Rico to Carolina, Puerto Rico, to the residence of CARLOS BONET-GONZALEZ, (a.k.a. "Charlie", a.k.a. "Charlie Brown"), to conduct radio tests using a 20\40

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wireless radio to be used for the importation of a cocaine load into Puerto Rico.

25. On or about November 1, 1997, in Humacao, Puerto Rico, **RAUL RIVERA-PEREZ**, (a.k.a. "Toño", a.k.a. "Macho"), **LUIS CARIBE-GARCÍA**, (a.k.a. "Papo", a.k.a. "Caribe"), **CARLOS BONET-GONZALEZ**, (a.k.a. "Charlie", a.k.a. "Charlie Brown"), **JULIO ORTIZ-GUEVARA**, and an individual known to the Grand Jury met to discuss the pick-up and smuggling of Seven Hundred (700) kilograms of cocaine into Puerto Rico, the sea route to be used in smuggling the cocaine.

All the foregoing acts were committed in furtherance of this conspiracy in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

TRUE BILL

WITNESS

GUILLERMO GIL
United States Attorney

Jorge E. Vega-Pacheco
Assistant U.S. Attorney
Chief, Criminal Division

Rosa Emilia Rodríguez-Vélez
Executive Assistant U.S. Attorney
Dated: February 5, 1998

Desirée Laborde-Sanfiorenzo
Assistant U.S. Attorney